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August 24, 2005

Ms. Marlene H. Dortch  
Secretary  
Federal Communications Commission  
445 12<sup>th</sup> Street, SW  
Washington, DC 20554

Re: Number Portability CC Docket 95-116

Dear Ms. Dortch:

On August 23, 2005, BellSouth met with Wireline Competition Bureau staff to discuss intermodal number portability. Attending the meeting from the Commission were Narda Jones, Cheryl Callahan, Greg Guice, Marilyn Jones, Sanford Williams and James Bachtell. Representing BellSouth at this meeting were Bill Shaughnessy, Ron Steen and the undersigned.

Copies of the attached presentation served as a basis for discussion. BellSouth provided the Commission with updated data on its experience with intermodal porting. The BellSouth representatives also expressed the view that if the Commission chooses to revise the current rule regarding intermodal porting intervals, it should follow the recommendation of the North American Numbering Council (NANC) Issue Management Group (IMG). After analyzing several proposals, the IMG found that its recommendation would result in the greatest time saved at a low estimated cost impact. Indeed, the NANC IMG recommendation would shorten the existing maximum porting interval from a period of four days to a period of two days, five hours. Finally, the BellSouth representatives responded to specific intermodal porting concerns which have been raised by various service providers.

Pursuant to Commission rules, please include a copy of this notice and attachment in the record of the proceeding listed above.

Sincerely,



Jeanine Poltronieri  
*Attachment*

cc: Narda Jones  
Cheryl Callahan  
Greg Guice

Marilyn Jones  
Sanford Williams  
James Bachtell